

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

	X	
	:	
<b>JONATHAN IMHOFF and</b>	:	
<b>GLEN AURELIUS,</b>	:	
<b>on behalf of themselves</b>	:	
<b>and all others similarly situated,</b>	:	<b>Civil Action No. 2:15-679</b>
	:	
<i><b>Plaintiffs,</b></i>	:	
	:	<b>Judge Arthur J. Schwab</b>
<b>v.</b>	:	
	:	
<b>WEATHERFORD INTERNATIONAL,</b>	:	
<b>LLC and WEATHERFORD U.S., L.P.;</b>	:	
	:	
<i><b>Defendants.</b></i>	:	
	:	
	X	

**Plaintiffs' Unopposed Motion for Final Approval  
of Class and Collective Action Settlement  
and Approval of Attorneys' Fees and Costs**

In accordance with Rules 23(e) and 23(h) of the Federal Rules of Civil Procedure, Class Counsel and the Class Representatives (named plaintiffs Jonathan Imhoff and Glen Aurelius) respectfully seek (i) approval for payment of attorneys' fees in the amount of \$197,039.04, (ii) approval for reimbursement of out-of-pocket litigation costs totaling \$2,960.96, and (iii) final approval of the Class Action Settlement Agreement and Release that the court preliminarily approved on April 4, 2016.

For the reasons set forth in the accompanying brief, the settlement is fair, reasonable, and adequate with respect to all members of the class. *See* Fed. R. Civ. P. 23(e)(2). The requested attorneys' fees are reasonable, moreover, and Class Counsel incurred only minimal out-of-pocket litigation costs. *See* Fed. R. Civ. P. 23(h). The court should therefore approve the settlement and award the requested fees and costs to Class Counsel.

As set forth in the Settlement Agreement, Defendants Weatherford International, LLC and Weatherford U.S., L.P. do not oppose this motion. A proposed order is attached.

Dated: August 10, 2016  
Pittsburgh, PA

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*Counsel for Plaintiffs  
and all other similarly situated*

Certificate of Service

I hereby certify that, on this 10th day of August, 2016, a true and correct copy of the foregoing **Plaintiffs' Unopposed Motion for Final Approval of Class and Collective Action Settlement and Approval of Attorneys' Fees and Costs and** was filed electronically via the Court's CM/ECF system, which will send notice and copies to counsel of record.

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